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MATTHEW CATE AND T.A. WOOD

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RAYMOND J. MANZANILLO,

Plaintiff,

v.

GREGORY D. LEWIS, et al.,

Defendants.

Case No. 3:12-cv-05983-JST

**STIPULATION AND ~~PROPOSED~~  
ORDER TO STAY THIS ACTION FOR A  
PERIOD OF FOUR WEEKS AND TO  
CONTINUE THE CASE MANAGEMENT  
CONFERENCE SCHEDULED FOR  
JULY 8, 2015**

Pursuant to Civil Local Rule 6-2, Plaintiff Raymond J. Manzanillo and Defendants N. Brown, Gregory D. Lewis, J. Hallock, K. McGuyer, Matthew Cate, and T.A. Wood (collectively “the Parties”) by and through their respective counsel hereby stipulate and request that the Court (1) stay this action for a period of four weeks from the date of the Court’s Order granting this request; (2) continue the case management conference currently scheduled for July 8, 2015, to a date convenient for the Court that follows the end of the stay; and (3) continue the current July 1, 2015, deadline for the Parties to file case management statements.

Plaintiff’s counsel is currently working with personnel at Corcoran State Prison to gain access to Mr. Manzanillo. That process has taken longer than expected, and Plaintiff’s counsel has not yet been able to meet or speak with Mr. Manzanillo; nor has counsel yet been able to secure copies of documents produced to Mr. Manzanillo in discovery thus far. The proposed stay will require the Court to reschedule the July 8 case management conference and extend the deadline for the Parties to file a case management statement, but it should not otherwise have a significant effect on the schedule for this case. Moreover, the requested stay will preserve both the Parties’ and the Court’s resources, as it will allow Plaintiff’s counsel the opportunity to confer with Mr. Manzanillo and review the materials already produced by Defendants before participating in a case management conference or any additional litigation practice.

**IT IS SO STIPULATED.**

DATED: June 24, 2015

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ Michael A. Wahlander

Francis J. Ortman III  
Aryeh M. Hersher  
Jason M. Allen  
Michael A. Wahlander

Attorneys for Plaintiff  
RAYMOND J. MANZANILLO

1 DATED: June 24, 2015

Respectfully submitted,

2 MCNAMARA LAW FIRM

3  
4 By: /s/ William Lee McCaslin

5 Peter Jon Hirsig  
William Lee McCaslin

6 Attorneys for Defendant  
7 N. BROWN

8  
9 DATED: June 24, 2015

Respectfully submitted,

10 CALIFORNIA STATE ATTORNEY  
11 GENERAL'S OFFICE

12  
13 By: /s/ Michael James Quinn

Michael James Quinn

14 Attorneys for Defendants  
15 GREGORY D. LEWIS; J. HALLOCK;  
16 K. MCGUYER; MATTHEW CATE AND  
17 T.A. WOOD

18  
19 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

20 I, Michael A. Wahlander, attest that concurrence in the filing of this stipulation has been  
21 obtained from the signatories, William Lee McCaslin and Michael James Quinn, counsel for  
22 Defendants.

23 Executed this 24th day of June, 2015, in San Francisco, CA.

24  
25 /s/ Michael A. Wahlander

Michael A. Wahlander


**~~[PROPOSED]~~ ORDER**

Based on the Parties' stipulation and good cause appearing, the Court orders as follows:

1. All further proceedings are STAYED for four weeks from the date of this order.

2. The Case Management Conference currently scheduled for July 8, 2015, is hereby rescheduled to August 19, and the deadline for the Parties' to file Case Management Statements, currently July 1, 2015, will be rescheduled to August 7, 2015.

DATED: June 26, 2015

  
HONORABLE JON S. TIGAR  
United States District Judge